



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001



ROGER W. KOBER
VICE PRESIDENT
ELECTRIC & STEAM PRODUCTION

TELEPHONE
AREA CODE 716 546-2700

June 29, 1984

Dr. Thomas E. Murley, Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: I & E Inspection Report 84-05
Notice of Violations
Inservice Inspections of Modified Components and Systems
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Dr. Murley:

In accordance with the above subject which stated

"As a result of the inspection conducted on March 27-30, 1984, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (49FR8583), the following violation was identified:"

10 CFR 50, Appendix B, Criterion XIV requires that measures shall be established to indicate the status of inspections and tests performed upon individual items of the nuclear power plant. These measures shall provide for the identification of items which have satisfactorily passed required inspections and tests, where necessary to preclude inadvertent bypassing of such inspections and tests. The R. E. Ginna Nuclear Power Plant Quality Assurance Program requires that the status change of equipment and systems be indicated in accordance with established rules. It further requires that procedures be established to indicate the status of inspections and tests of component and system modifications.

Contrary to the above, on or before March 27, 1984 measures were not established to preclude inadvertent bypassing of inservice inspections of modified components and systems which are required to be included in the

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facility Inservice Inspection Program in that no provisions exist to assure added welds are incorporated into the ISI program. Also stated in this inspection report, "The inspector was informed that a procedure addressing the above is being considered by the licensee."

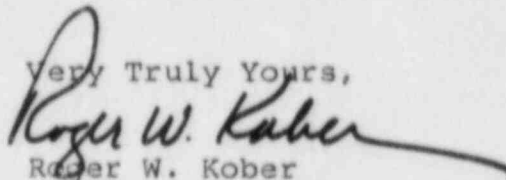
the following is submitted in response.

Corrective action to address this violation is as follows:

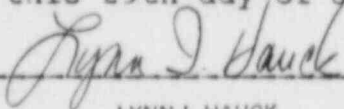
Presently, there is no formal method available to assure that required additions are made to the Inservice Inspection Program for modified components and systems. Rochester Gas and Electric is conducting a comprehensive reassessment of the modification process. This was done in response to Inspection Report 83-23. A six-part Modification Process Improvement Plan was formulated in our January 27, 1984 response.

As part of item five of this six-part plan, procedures will be developed or revised to provide a formalized method to assure that required additions are made to the Inservice Inspection Program for modified systems and components. These procedures will be in place prior to September 30, 1984.

Very Truly Yours,


Roger W. Kober

Subscribed and sworn to me
on this 29th day of June 1984.



LYNN I. HAUCK

NOTARY PUBLIC, State of N.Y., Monroe County
My Commission Expires March 30, 1985

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